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September 30, 2019

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Ms. Natalie Creed  
Hazardous Waste Bureau Chief  
Idaho Department of Environmental Quality  
1410 North Hilton  
Boise, ID 83706

**RE: US Ecology Idaho (USEI) Site B – IDD073114654**  
*September Monthly Progress Report on Recovery Actions Related to the November 17, 2018 Explosion at the USEI Site B Facility ("Incident")*

Dear Ms. Creed:

As requested in IDEQ's letter dated December 18, 2018, USEI is hereby submitting the monthly progress report for September 2019. This report details the activities undertaken in the recovery process for the month of September. This report covers activities from August 26 through September 20, 2019. The next report will cover activities from September 23, 2019 through October 25, 2019.

Throughout the month USEI has performed various operations to evaluate the facility and bring it back to a state of compliance following the Incident. The actions taken during the month are outlined below.

After receiving approval from IDEQ on February 7, 2019, USEI began receiving loads of bulk material for direct landfill on February 8, 2019. During April, USEI provided IDEQ with a PE certification for the Stabilization Facility as well as a certification that all ancillary equipment needed for solidification operations was available. IDEQ subsequently provided an authorization, dated April 11, 2019, allowing USEI to resume solidification operations at the Outdoor Stabilization Facility. On May 31, 2019, USEI provided IDEQ with an additional Class 2 Permit Modification and Request for Temporary Authorization (RTA) to undertake hazardous waste treatment operations. DEQ provided approval for the RTA in a letter dated June 6, 2019. At this time USEI is receiving limited quantities of hazardous waste for treatment, storage, and/or disposal. The first shipments of hazardous waste for treatment were received on June 17, 2019. USEI continues to receive both containers and bulk loads of waste for treatment and disposal.

**Inspections** – Inspections have been performed and documented as required; any area that could not be inspected due to structural damage or due to other safety factors was noted on the inspection form. At this time all areas have been placed into a safe configuration. Since containers are not being stored and waste is not being treated within the Containment Building, USEI will inspect the area on a weekly basis, at a minimum. All other inspection schedules will

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remain unchanged. A memo was placed in the operating record explaining the weekly inspection schedule.

**Leachate Management** – On August 26, 2019 USEI measured leachate levels for the Containment Building area. Initial liquid levels, dates pumped, amount removed, and final sump levels are shown in the table below. Evaluation of the damage and repairs to the Debris Portion secondary sump were performed between August 27 and September 11, 2019. The Debris Portion secondary sump was pumped on September 12, 2019.

| Date Pumped             | Area          | Sump                    | Initial Level (inches) | Gallons Removed | Final Level (inches) |
|-------------------------|---------------|-------------------------|------------------------|-----------------|----------------------|
| 08/27/2019              | Stabilization | MBT 1 - Primary         | 10                     | 20              | <4                   |
| 08/27/2019              | Stabilization | MBT 1 - Secondary       | 14                     | 10              | <4                   |
| 08/27/2019              | Stabilization | MBT 2 - Primary         | 12                     | 20              | 0                    |
| N/A                     | Stabilization | MBT 2 - Secondary       | 1                      | Not Pumped      | 1                    |
| 08/26/2019              | Stabilization | Building - East         | 4                      | 10              | 1                    |
| 08/26/2019              | Stabilization | Building - West         | 7                      | 20              | 1                    |
| 08/27/2019              | Stabilization | Truck Apron - East      | 5                      | 10              | 1                    |
| N/A                     | Stabilization | Truck Apron - West      | 2                      | Not Pumped      | 2                    |
| 08/27/2019 & 08/28/2019 | Debris        | Building - Primary      | 10                     | 7,000           | 1                    |
| 09/12/2019              | Debris        | Building - Secondary    | 12                     | 100             | 1                    |
| N/A                     | Debris        | Truck Apron - Primary   | 2                      | Not Pumped      | 2                    |
| N/A                     | Debris        | Truck Apron - Secondary | 1                      | Not Pumped      | 1                    |

USEI has completed leachate inspections in all other areas of the facility, as required by permit, and has removed accumulated leachate as required. Removed leachate has been filtered through the leachate treatment system and has been discharged to site surface impoundments for evaporation. Leachate levels for all areas continue to be in keeping with levels associated with normal operations.

**Precipitation** – Collected precipitation has been monitored and removed from container storage and RCRA tank areas as needed. All precipitation removed from these areas is discharged to the site surface impoundments for evaporation.

Collected precipitation from the Mix Bin Tanks in the Indoor Stabilization facility remains in Tank #2 at this time. No additional precipitation was removed from the Mix Bin Tanks during the current reporting period.

**Container Management** – Containers that became damaged or degraded as a result of the Incident are being managed appropriately by being covered, repackaged, overpacked, or batched and treated as needed. USEI continues to work through the inventory of containers that were



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onsite at the time of the incident. These older containers are being sampled as needed, placed into batches and treated. Since use of the Pad 7 building was approved in July, USEI has moved containers of retail waste packaged in fiber boxes back into the building and has repackaged and consolidated many degraded containers. No loads were sent off-site during the month of September.

**Evidence Material** – Evidence from the Incident remains in secure storage at Container Storage Area 1 (CSA 1) at this time. This includes tagged debris pieces, various split samples that have been collected, empty drums from the back of the haul truck at the Containment Building, containers of burnt magnesium (WSID # 29857-0) and floor sweeps (WSID # 29853-0), overpack drums of magnesium fines (the material involved in the explosion, WSID # 29856-0), and drums of material retrieved from the bottom of MBT 1 prior to decontamination of the Containment Building. All remaining containers of magnesium material from Reade Manufacturing Company, the company whose waste stream was being treated when the explosion occurred, remain on site at this time.

(b) (6), (b) (7)(A), (b) (7)(C)

Baker Risk received analytics for all samples collected, and determined the cause of the Incident. The final investigation report was completed July 22, 2019, and a full copy of the report was provided to DEQ on July 31, 2019. USEI has requested that this information remain confidential until external investigations being conducted by various agencies are complete.

**Cleanup Material** – USEI's contractor JC Constructors, Inc. began demolition of the Containment Building structure on July 15, 2019. Demolition was completed on August 12, 2019. Small amounts of metal and foam debris were generated during the demolition operation. These materials were cleaned up and placed into bins which were stored at CSA 1 with other bins of cleanup material that were generated by facility personnel throughout the cleanup process. On August 29, 2019, USEI received approval from IDEQ for use of a shredder to downsize light-gage metal debris from the building cleanup prior to micro-encapsulation. The shredder arrived onsite on September 14, 2019. Shredding activities began on September 17 and were completed on September 20, 2019. The majority of the shredded material was micro-encapsulated the same day shredding occurred. However, two bins of material remain to be encapsulated at this time, and will be encapsulated as time allows. Several bins of foam material remain in storage at CSA 1 at this time as well. As time permits, USEI will begin macro-encapsulating this material and placing it in one of the site landfills.

USEI has continued monitoring the area outside the fence for additional foam material. No additional material was identified during the last inspection of the fence. USEI personnel will continue monitoring the fence line on a monthly basis to ensure material is not exiting the facility.



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**Facility Structures** – The Containment Building sustained major damage in the Incident and will need to be repaired/rebuilt. Demolition of the steel structure of the Containment Building began on July 15, 2019. Final removal of all structural steel was completed on August 12, 2019. Further evaluation of the integrity of the Debris Side containment is still needed. The date for removal of the concrete containment and Mix Bin Tanks from the Stabilization Side of the Containment Building is tentatively scheduled to begin the week of October 14, 2019. The Mix Bin Tanks are covered at this time and will remain covered until the next phase of demolition activities commence.

Portions of the chain link fencing were removed from the east side of the Containment Building to facilitate demolition activities. Fencing along the road near the former administration building complex, and the secured area in CSA 1 remains intact.

The site vehicle wash building was removed January 8, 2019. Water to the truck wash area was restored on January 16, 2019. Up to January 16, 2019 a portable water source was needed to operate the pressure washer. The contract for reconstruction of the Truck Wash building has been awarded to Bideganeta Construction, Inc. of Mountain Home, ID. Construction of the building began on September 4, 2019. Construction of the truck wash building is scheduled to be completed by the end of October 2019.

The site water system was partially evaluated/repared on January 16, 2019. Broken lines at the administration/decon areas were capped during the evaluation and repaired on January 16. All water tanks were thickness-tested on February 6, 2019 and found to be functional. Water to the Outdoor Stabilization Facility was restored April 19, 2019. USEI has received a quote for reconstruction of the Pump House building. USEI's insurance adjuster has given their approval to proceed with the rebuild of the building. This project has also been awarded to Bideganeta Construction. The project start date is unknown at this time.

The site decontamination facilities and field tech office were damaged during the Incident and had to be removed along with other buildings in the administration complex. USEI has awarded the contract for construction of a new decontamination building, to be located near the location of the previous men's decontamination facility, and a new field tech office, to be located in the location of the old receiving/laboratory building, to Bideganeta Construction as well. The decontamination facility project began July 15, 2019, and will continue until completed. The new decon facility is approximately 75% complete at this time. The start date for the field tech office is unknown at this time.

The Outdoor Stabilization Facility office is currently being used to house the fingerprint lab in the near term. The new laboratory building will be located south of the main administration office in the new office complex, located near the main gate. Placement of the building was completed on August 28, 2019, with installation of the cabinets and fume hoods taking place the following week. USEI is currently waiting for Idaho Power to install power to the area so that the lab building can be used.



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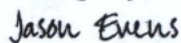
A building to house Receiving and a new guardhouse/truck scale office arrived at the facility and were placed on September 12, 2019. These buildings will not be used until power is installed to the area.

A portable shower/toilet unit located in the temporary administration trailer area was put into service on January 10, 2019. The unit contains four separate shower/toilet/sink stations. An additional unit with men's and women's restroom stations (toilets/sinks only) is present in the area and is functional.

**Facility Personnel** – Since USEP's last report staffing remains unchanged.

If you have any questions regarding the content of this letter or require additional information, please call me or Rebecca Hogaboam at (208) 834-2275.

Regards,

DocuSigned by:  
  
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Jason Evens  
General Manager

cc: **Barbara McCullough, EPA Region 10**  
Albert Crawshaw, IDEQ  
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